

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 26, 1997

Jim Pledger, Treasurer
Democratic Party of ArkansasFederal Account
1300 West Capitol
Little Rock, AR 72201

Identification Number:

C00024372

Reference:

Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Pledger:

On November 5, 1997, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your November 20, 1997 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your amended Schedule(s) A still fails to disclose occupation and employer information for contributions from several individuals. The Commission notes the receipt of a copy of your <u>initial</u> solicitation which includes a request for contributor information. To meet "best efforts," you need to clarify the committee's procedures for follow-up requests and the disclosure of previously unreported information (received after reports have been filled). Please amend your report to include the omitted information.

-Schedules H3 and H4 of your amendment disclose an in-kind contribution from Bylites, Inc. Production Services for \$1550 on 5/14/97. The federal portion of \$341 was transferred to the non-federal account on 6/18/97, AFTER "receipt" of the in-kind. Be advised that corporate in-kind donations may be accepted if the federal share is paid or transferred to the non-federal account in advance of the acceptance of the in-kind by the

federal account. According to the federal account's payment date, this is now considered a prohibited contribution and must be refunded.

For reporting purposes, the Schedule H4 entry should disclose "fundraising" for the category, and include the "Jefferson-Jackson Dinner" unique code. Additionally, the purpose of disbursement should be provided next to the "in-kind" notation. Furthermore, the last entry on Schedule H4, page 56 of 57, should be corrected to reflect the use of the in-kind corporate contribution as a NON-federal disbursement. Please amend the Schedule H4 entry to disclose \$1550 for the TOTAL AMOUNT, \$0 for the FEDERAL SHARE and \$1550 for the NON-FEDERAL SHARE.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Scott Francis on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division

John D. A.